

# AIVI LIMITED

## PRIVACY POLICY

*Effective Date: March 2026 | Version 1.1 | aivi.limited*

### 1. Who We Are

AIVI LIMITED ("AIVI", "we", "us", or "our") is a limited company incorporated in Hong Kong under the Companies Ordinance (Chapter 622 of the Laws of Hong Kong) on 16 December 2025, Company Registration Number 79409382.

Registered address: Unit 04-05, 16/F, The Broadway, No. 54-62 Lockhart Road, Wan Chai, Hong Kong.

We operate the platform accessible at aivi.limited (the Platform), which provides end-to-end infrastructure services enabling content creators to produce, market, and distribute limited-edition, investment-grade physical collectibles - including 3D-scanned figures, sculptural objects, signed photographs, and bespoke luxury items.

Contact for all privacy-related matters: info@aivi.limited

### 2. Scope of This Policy

This Privacy Policy governs the collection, use, storage, and disclosure of personal data in connection with:

- Visits to aivi.limited and any sub-domains (Website Visitors);
- Content creators who apply for or participate in the AIVI creator program (Creators);
- Customers who purchase collectibles or enter drops, lotteries, or pre-orders (Buyers);
- Business contacts, agency partners, and talent scouts (Partners).

This Policy applies globally. Where you are located in the European Economic Area (EEA), United Kingdom, or California (USA), additional rights described in Sections 10-12 apply.

### 3. Personal Data We Collect

#### 3.1 Website Visitors

- IP address and approximate geographic location (country / city);
- Browser type, operating system, device identifiers;
- Pages visited, time on site, referral source, click patterns;
- Cookie identifiers and analytics identifiers (see Section 8).

#### 3.2 Creators

- Full legal name, stage name, date of birth (age verification);

- Contact details: email address, phone number, social media handles;
- Identity documents (where required for KYC, IP, and likeness-rights agreements);
- Payment and banking details for revenue disbursements;
- Contract records, communications history, performance metrics;
- Content files: photographs, videos, design references submitted by the Creator.

*Note: Any physical or biometric data collected during the production process (such as measurements or 3D scan sessions) is governed exclusively by the Creator Agreement signed prior to any production activity and is not collected via this Website.*

### 3.3 Buyers

- Full name, delivery address, email address, phone number;
- Order history, selected products, drop or lottery participation records;
- Payment information - processed securely by Airwallex; we do not store raw card or bank data on our servers;
- Customer support communications.

### 3.4 Partners

- Name, job title, company name, professional email and phone number;
- CRM interaction history, pitch-deck engagements, and meeting notes.

## 4. How We Collect Your Data

- Directly from you - via contact forms, creator application flows, order checkout, and email / DM correspondence;
- Automatically - through cookies and analytics tools when you visit our Website (see Section 8);
- From third parties - social media platforms when you engage with our accounts; talent agencies or scouts who refer creators to us;
- From payment and logistics partners - in the course of processing transactions and fulfilling deliveries.

## 5. Why We Process Your Data and Our Legal Basis

Purpose	Categories of Data	Legal Basis (GDPR)
Operating the Platform and fulfilling orders	Buyer identity, address, order data	Performance of contract (Art. 6(1)(b))
Managing creator partnerships	Creator identity, content files, contracts	Contract (Art. 6(1)(b))
Processing payments via Airwallex	Payment details, name, order amount	Contract + Legal obligation

Customer support and communications	Contact details, communication history	Contract / Legitimate interests
Website analytics and optimisation	Usage data, cookies, IP address	Legitimate interests / Consent for cookies
Marketing - drop announcements, newsletters	Email address, name, preferences	Consent (Art. 6(1)(a))
Legal compliance and fraud prevention	All relevant categories	Legal obligation (Art. 6(1)(c))
Partner and B2B relationship management	Partner contact and CRM data	Legitimate interests (Art. 6(1)(f))

## 6. Payment Processing

Payments on the AIVI Platform are processed by Airwallex (Airwallex Payment Services Limited and its affiliates), a regulated financial services provider incorporated in Hong Kong and licensed across multiple jurisdictions globally.

When you make a purchase, your payment data (card details, bank information, or other payment credentials) is submitted directly to Airwallex via a secure, encrypted connection. AIVI does not store, access, or process raw payment credentials on its own servers.

Airwallex processes your payment data as an independent data controller in accordance with its own privacy policy, available at [airwallex.com/terms/privacy-policy](https://airwallex.com/terms/privacy-policy). We share only the minimum information required to complete the transaction: your name, order amount, currency, and billing address.

## 7. Sharing Your Data With Third Parties

AIVI does not sell your personal data. We share data only with:

- Airwallex - to process payments (see Section 6);
- Manufacturing and production partners - to produce physical collectibles per the approved order;
- Logistics and shipping providers - to fulfil and track global deliveries;
- Google LLC - for website analytics via Google Analytics (see Section 8);
- Email and CRM platforms - to send transactional and marketing communications where consent has been given;
- Legal, accounting, and compliance advisors - under strict confidentiality obligations;
- Law enforcement or regulatory authorities - where required by law or to protect the rights and safety of AIVI, Creators, or Buyers.

All third-party processors are bound by Data Processing Agreements (DPAs) where required under GDPR.

## 8. Cookies and Tracking Technologies

### 8.1 Types of Cookies We Use

- Strictly necessary cookies - essential for Website function (session management, security). Cannot be disabled.
- Analytics cookies - Google Analytics collects anonymised usage data (pages viewed, session duration, traffic source) to help us improve the Website.
- Preference cookies - remember your language, region, and display settings.

### 8.2 Your Cookie Choices

You can control non-essential cookies through your browser settings at any time. A cookie consent management tool will be implemented on the Website shortly. Until then, continued use of the Website implies acceptance of the cookies described above.

For information on how Google uses analytics data, visit: [policies.google.com/technologies/partner-sites](https://policies.google.com/technologies/partner-sites)

## 9. How Long We Keep Your Data

- Buyer transaction data: 7 years (financial and tax compliance obligations);
- Creator contracts and identity records: duration of contract + 7 years;
- Marketing contact data: until consent is withdrawn, or 3 years of inactivity;
- Website analytics data: up to 26 months (Google Analytics default);
- Customer support records: 3 years from the last interaction.

## 10. International Data Transfers

AIVI operates globally. Your personal data may be transferred to and processed in countries outside your country of residence, including Hong Kong, and countries where our manufacturing, logistics, and technology partners are based.

Where data is transferred from the EEA or UK to a country not recognised as providing an adequate level of protection, we ensure appropriate safeguards such as Standard Contractual Clauses (SCCs) approved by the European Commission.

Hong Kong's Personal Data (Privacy) Ordinance (PDPO) provides a baseline level of data protection. Our operations comply with the PDPO and, where applicable, with the GDPR and UK GDPR.

## 11. Your Privacy Rights

### 11.1 Rights Under GDPR (EEA and UK Residents)

- Right of access - request a copy of personal data we hold about you;
- Right to rectification - ask us to correct inaccurate or incomplete data;

- Right to erasure ("right to be forgotten") - request deletion where we have no legal basis to retain it;
- Right to restriction - ask us to limit processing in certain circumstances;
- Right to data portability - receive your data in a machine-readable format;
- Right to object - object to processing based on legitimate interests or for direct marketing;
- Right to withdraw consent - at any time, without affecting prior lawful processing.

### **11.2 Rights Under CCPA (California Residents)**

- Right to know what personal information we collect, use, and disclose (we do not sell personal information);
- Right to delete personal information we have collected from you;
- Right to non-discrimination for exercising your privacy rights.

### **11.3 How to Exercise Your Rights**

To exercise any right, contact us at [info@aivi.limited](mailto:info@aivi.limited) with subject line "Privacy Request". We respond within 30 days (GDPR) or 45 days (CCPA). We may verify your identity before processing. EEA and UK residents may also lodge a complaint with their local data protection authority.

## **12. Age Restriction**

The AIVI Platform and all products are intended for individuals aged 18 and over. By accessing the Platform or placing an order, you confirm that you are at least 18 years old. We do not knowingly collect personal data from minors. If you believe a minor has submitted data to us, please contact [info@aivi.limited](mailto:info@aivi.limited) immediately.

## **13. Security**

- Encryption in transit (HTTPS / TLS) and at rest where applicable;
- Role-based access controls limiting data to authorised personnel only;
- Confidentiality obligations for all employees, contractors, and processors;
- Regular review and improvement of security practices.

In the event of a data breach affecting your rights and freedoms, we will notify relevant authorities and affected individuals as required by law.

## **14. Intellectual Property and Likeness Rights**

All use of a Creator's image, likeness, and brand assets is governed by a separate Creator Agreement signed prior to any production activity. Creators retain full ownership of their likeness. AIVI receives a limited, non-exclusive licence to process such data solely for manufacturing and distributing the agreed collectibles. AIVI will not use any Creator's likeness for other commercial purposes without prior written consent.

## **15. Third-Party Links**

Our Website may contain links to third-party sites or social media platforms. This Privacy Policy does not apply to those external sites. We encourage you to review their policies before providing any personal data.

## **16. Changes to This Policy**

We may update this Privacy Policy at any time. Changes will be posted on this page with an updated effective date. For material changes, we will notify you by email or via a prominent Website notice. Continued use of the Platform after changes are posted constitutes acceptance.

## **17. Contact Us**

AIVI LIMITED  
Unit 04-05, 16/F, The Broadway, No. 54-62 Lockhart Road  
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